

Exhibit A

**Defendants' Correction of Plaintiffs' Exhibits C and E
Regarding Over-Designation**

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Date	Number of Pages of Documents Alleged by Plaintiffs to Have Been Produced from Logs	Defendants' Correction
Feb. 18, 2005	2,824	<ul style="list-style-type: none"> • 22,825 pages produced • Only 121 pages containing redactions were logged and withheld as privileged • More than 22,000 pages were produced on rolling basis promptly after responsiveness review or after Court resolved dispute over responsive dates on Apr. 26, 2005 • Those 22,000+ pages were never designated as privileged on any log
Apr. 26, 2005	1,810	
Aug. 31, 2005	4,339	
Sep. 2, 2005	4,901	
Sep. 9, 2005	717	
Sep. 20, 2005	8,234	
Nov. 1, 2005	34	<ul style="list-style-type: none"> • Only 97 pages • Documents de-designated because Special Master issued case-specific standards for work product designation (Oct. 31, 2005 Tr. 109-13)
Nov. 4, 2005	28	
Nov. 23, 2005	35	
Dec. 16, 2005	2,829	<ul style="list-style-type: none"> • 22,425 pages produced • Documents de-designated in response to Special Master's Dec. 1, 2005 decision • Documents are double counted in part because they include re-production of previously redacted documents (i.e., where redactions appeared on part of a page), because of software constraints
Dec. 22, 2005	18,707	
Dec. 23, 2005	889	
Jan. 8, 2006	1,902	<ul style="list-style-type: none"> • 3,461 pages (3,530 pages in plaintiffs' total is in error) • Documents were privileged on their face • Defendants subsequently learned that documents had been disclosed to third parties, especially outside auditors, and produced them • Documents are double counted in part because many documents are electronic copies of BCE's public securities filings that consist of a cover e-mail which was produced in December 2005 with entirely redacted attachments; once BCE realized that those documents were not privileged, the same number of pages was Bates stamped a second time
Jan. 11, 2006	1,129	
Jan. 19, 2006	499	
Feb. 21, 2006	7,123	<ul style="list-style-type: none"> • 7,123 pages produced • Documents are double counted in part because they include re-production of previously redacted documents (i.e., where redactions appeared on part of a page), because of software constraints
TOTAL	56,000	In addition to comments above, plaintiffs' page count is also inflated because:

		<ul style="list-style-type: none">• Special Master required BCE to produce cover e-mails whose attachments were privileged<ul style="list-style-type: none">○ Since December 2005, BCE produced nearly 7,200 pages that are <i>redacted in full</i> (that is, privileged attachments to non-privileged cover e-mails)○ Thus, nearly 13% of the pages plaintiffs include in their 56,000 total page count are <i>blank</i>• Many of the documents on the logs are <i>identical copies</i>, which were each logged for the sake of consistency
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